



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 30, 2019

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MR. JOHN ARTHUR
BASF CORPORATION
AGRICULTURAL PRODUCTS
26 DAVIS DRIVE, PO Box 13528
RESEARCH TRIANGLE PARK, NC 27709-3528

Dear Mr. Arthur:

Subject: Transfer of Pesticide Registrations From Company Number **264** to
Company Number **7969**

Pursuant to your request in your letter and transfer agreement of April 02, 2019 (with special request to delay transfer until October 30, 2019) we have approved the transfer of the following registrations from BAYER CROPSCIENCE LP, company number 264 to BASF CORPORATION, company number 7969.

The effective date of these changes is the date of this letter.

Registered Products	Old EPA Reg. No.	New EPA Reg. No.
PONCHO 600	264-789	7969-458
PONCHO/VOTIVO	264-1109	7969-459

You may continue to sell and distribute existing product stocks, bearing the transferor's label, for 18 months from the date of this letter. Per your request for an 18-month transition period, you may also continue to produce new product bearing the transferor's existing, previously approved label, and sell and distribute that new product, for 18 months after the date of this letter, but you may not sell and distribute product bearing the transferor's label after that 18-month period. Each product container or package bearing the transferor's label that is sold or distributed after the effective date of this product registration transfer must be clearly and accurately marked with the batch number, lot number, or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form "Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to distribution or sale of the product containing the new registration number. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

With regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The annual maintenance fee is based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period, or the affected registrations may be canceled.

By copy of this letter we are informing the transferor of these changes. If you have any questions, please contact Louis Vaughn at (703) 308-8114.

Sincerely,



Kimberly Smith, Chief
Information Services Branch
Information Technology & Resource Management Div. (7504P)

cc: DR. GEORGE SABBAGH
BAYER CROPSCIENCE LP
800 N. LINDBERGH BLVD.
ST. LOUIS, MO 63167-

RE: L_264_REG_7969_10_30_2019

CHECKLIST for TRANSFER of REGISTRATION(S) ONLY			
Transferor: Bayer CropScience LP		Co. #: 264	
Transferee: BASF CORPORATION - AGRICULTURAL PRODUCTS		Co. #: 7969	
Transfer Type: Registration Only		Date: LTR: 04/02/2019 PP: 04/03/2019, 06/27/2019, 09/05/2019, 10/30/2019	
CHECK	REQUIREMENTS		
✓	Entry into Log Book	✓	Company info checked in OPPIN and printed
✓	Products verified in OPPIN (active/cancelled/suspended, etc.)	✓	Maintenance Fee Records checked (active/cancelled/SLN/fee paid)
Ensure That the Package Contains the Following:		COMMENTS	
✓	(1) XFER Agreement Has Original Signatures from Both Companies?		
✓	(2) Name, Address & State of Incorporation of Transferor (& Co. #)	DE	
✓	(3) Name, Address & State of Incorporation of Transferee (& Co. #.)	DE	
✓	(4) Name(s) / List & EPA Registration No.(s) of the product(s) being transferred.	264-789, 264-1109	
✓	(5) Statement that the Transferor transfers to the Transferee all right, title, and interest in the EPA registration(s) listed in the document.		
✓	(6) Statement that the transferred registration(s) shall not serve as collateral or otherwise secure any loan or other payment arrangement or executory promise. The reg'n(s) shall not revert to the Transferor unless a new transfer agreement is submitted to & approved by the Agency		
✓	(7) Description of the general nature of the underlying transaction, e.g., merger spin-off, bankruptcy (no financ'l info. need be disclosed)	SALE	
✓	(8) Statement that the Transferor and Transferee understand that any false statement may be punishable under law (18 USC1001)		
✓	(9) An acknowledgement by Transferee that his rights & duties concerning the reg'n under FIFRA and 40 CFR, Ch. 1 will be deemed by EPA to be the same as those of the Transferor at the time the transfer is approved.		
	(10) Notarized Statement from Transferor Affirming that:		
✓	(A) The person signing the transfer agreement is authorized by the registrant to bind the Transferor.		
✓	(B) No court order prohibits the transfer, & that any required court approvals have been obtained.		
✓	(C) The transfer is authorized under all relevant Federal, State & local laws, & all relevant corporate charters, bylaws, partnerships, or other agreements.		
	Note: It is preferable that the Affirmation Statement be signed by someone <u>other</u> than the person signing the transfer agreement.		
✓	Look in OPPIN for Next REG #(s) and EUP #	7969-458	
✓	OPPIN Work		
✓	Generate Letter and Give to Branch Chief for Signature		
Copies of Letter Made and Distributed/Mailed			
✓	Transferor	✓	RD, JFR, PM1
✓	Transferee	✓	In Transfer File
✓	Updated Log Book	Completed: <i>L. Vaughn</i> Date: 10/30/2019	
Comments: REG XFER -Post April 25, 2018 - "New Production" language applies. New First Paragraph in approval letter. On April 03, 2019, the Agency received a Product Registration Only Transfer from BAYER CropScience LP (264) to BASF Corporation (7969). Due to production issues, there have been two requests to delay/suspend processing of this transfer. The first request was on June 27, 2019 (requesting that it be delayed until September 09, 2019). The second request was on September 05, 2019. That request was to delay the transfer until October 30, 2019. On October 29, 2019, both transferor and transferee confirmed that the Agency should proceed with this transfer on October 30, 2019. LWV			

Vaughn, Louis

From: Vaughn, Louis
Sent: Thursday, October 31, 2019 8:36 AM
To: John.Arthur@BASF.com; George.Sabbagh@Bayer.com
Cc: Amy J McCaskill
Subject: Transfer BAYER 264 REG BASF 7969
Attachments: L_264_REG_7969_10_30_2019.pdf

On April 03, 2019, the Agency received a Product Registration Only Transfer from **BAYER CropScience LP (264)** to **BASF Corporation (7969)**. Due to production issues, there have been two requests to delay/suspend processing of this transfer. The first request was on **June 27, 2019** (requesting that it be delayed until September 09, 2019). The second request was on **September 05, 2019**. That request was to delay the transfer until **October 30, 2019**. On **October 29, 2019**, both transferor and transferee confirmed that the Agency should proceed with this transfer on **October 30, 2019**.

Attached is the Product Registration Only transfer (no data) of product **264-789** and product **264-1109**. This was a sale.

Product **264-789** is now product **7969-458**

Product **264-1109** is now product **7969-459**

For Change of Address or Agent:

<http://www2.epa.gov/pesticide-registration/pesticide-registration-manual-how-report-changes-company-name-or-address>

For Product Transfers, Data Transfers or Company Numbers Transfers:

<http://www2.epa.gov/pesticide-registration/pesticide-registration-manual-chapter-16-transfer-product-registrations-and>

For Other Information: <http://www2.epa.gov/pesticide-registration/pesticide-registration-manual>

Louis Vaughn, MS
Information Management Specialist
U.S. Environmental Protection Agency
OCSPP/OPP/ITRMD/ISB
vaughn.louis@epa.gov

Vaughn, Louis

From: Vaughn, Louis
Sent: Thursday, October 31, 2019 8:40 AM
To: Adams, Teretha; Dillard, Sylvia; Eagle, Venus
Cc: Keigwin, Richard; Barber, Delores; Smith, Kimberly
Subject: FW: Transfer BAYER 264 REG BASF 7969
Attachments: L_264_REG_7969_10_30_2019.pdf

For your records and jackets.

Louis Vaughn – USEPA/OCSP/OPP/ITRMD/ISB

From: Vaughn, Louis
Sent: Thursday, October 31, 2019 8:36 AM
To: John.Arthur@BASF.com; George.Sabbagh@Bayer.com
Cc: Amy J McCaskill <amy.mccaskill@basf.com>
Subject: Transfer BAYER 264 REG BASF 7969

On April 03, 2019, the Agency received a Product Registration Only Transfer from **BAYER CropScience LP (264)** to **BASF Corporation (7969)**. Due to production issues, there have been two requests to delay/suspend processing of this transfer. The first request was on **June 27, 2019** (requesting that it be delayed until September 09, 2019). The second request was on **September 05, 2019**. That request was to delay the transfer until **October 30, 2019**. On **October 29, 2019**, both transferor and transferee confirmed that the Agency should proceed with this transfer on **October 30, 2019**.

Attached is the Product Registration Only transfer (no data) of product **264-789** and product **264-1109**. This was a sale.

Product **264-789** is now product **7969-458**

Product **264-1109** is now product **7969-459**

For Change of Address or Agent:

<http://www2.epa.gov/pesticide-registration/pesticide-registration-manual-how-report-changes-company-name-or-address>

For Product Transfers, Data Transfers or Company Numbers Transfers:

<http://www2.epa.gov/pesticide-registration/pesticide-registration-manual-chapter-16-transfer-product-registrations-and>

For Other Information: <http://www2.epa.gov/pesticide-registration/pesticide-registration-manual>

Louis Vaughn, MS
Information Management Specialist
U.S. Environmental Protection Agency
OCSP/OPP/ITRMD/ISB
vaughn.louis@epa.gov



March 26, 2019

Document Processing Desk (XFER)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Dear Mr. Vaughn:

**Subject: Bayer CropScience LP (EPA Company Number 264)
Transfer of EPA Product Registration to
BASF Corporation
(EPA Company Number 7969)**

Bayer CropScience LP [EPA Company Number 264] (the Transferor) requests that the U.S. Environmental Protection Agency transfer certain EPA registered products to BASF Corporation [EPA Company Number 7969] (the Transferee).

A Transfer Document, executed by authorized representatives of both parties, provides the required documentation and affirmations delineated at 40 CFR §152.135(b) and (c) to effect this request for transfer of EPA product registrations. The Transfer Document is enclosed with this letter.

In support of the sale of the products and the registrations from Bayer CropScience LP, to BASF Corporation, the sale agreement provides a transition period of eighteen months after EPA's approval of the transfer of the registrations and corresponding product labels. Bayer CropScience LP provides the licenses and other necessary rights to use the company name and logo during the transition period. This allows for the continuation of production during this period with seamless transition of the product registrations while maintaining supply of the product to customers. During the transition period, BASF Corporation completes internal activities to ensure manufacturing and supply processes are established to produce product bearing BASF Corporation registered labels upon obtaining the necessary state registrations. In addition, the sales agreement provides, as necessary, transitional services including regulatory, manufacturing, supply, and product services (e.g., call center) support for this transitional period.

Consistent with the sale agreement explained above for the registered products subject to this transfer, Bayer CropScience LP requests that EPA allow the labels which currently appear on Bayer CropScience LP products to continue to be used up to 18 months after the effective date of the transfer.

Under the terms of 40 CFR §152.135(d), I understand that the Agency will approve the transfer without requiring that the Transferee obtain new registrations and that the Agency will notify the Transferor and the Transferee of its approval of this transfer request.

Please contact Sundee Williams at 919-549-2255 or sundee.williams@bayer.com if you require any additional information. Thank you for your assistance in this matter.

Kind Regards,

George Sabbagh
Bayer CropScience LP

Crop Science
A Division Of Bayer
2 T. W. Alexander Drive
Research Triangle Park, NC 27709

Transfer of Registration
Required by 40 CFR 152.135

(1) Name, Address and State of incorporation of transferor:

Bayer CropScience LP
(EPA Company Number 264)
800 N. Lindbergh Blvd.
St. Louis, MO 63167
State of Incorporation: Delaware

(2) Name, Address and State of incorporation of transferee:

BASF Corporation
(EPA Company Number 7969)
26 Davis Drive
Research Triangle Park, NC 27709
State of Incorporation: Delaware

(3) Names and EPA Registration Numbers of the products being transferred:

EPA Registered Product Name	Current EPA Registration Number	New EPA Registration Number
Poncho 600	264-789	
Poncho/Votivo	264-1109	

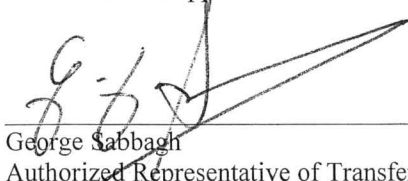
(4) The transferor, Bayer CropScience LP transfers irrevocably to the transferee, BASF Corporation, all right, title and interest and complete ownership in the EPA Registrations listed in this document in (3) above.

(5) The transferred registrations shall not serve as collateral or otherwise secure any loan or other payment arrangement or executory promise, and the registrations shall not revert to the transferor unless a new transfer agreement is submitted to and approved by the Agency.


(6) This transfer is due to a mutual request of transferor and transferee based upon an Asset Sales Agreement between transferor and transferee.

(7) The transferor and transferee understand that any false statement in this document may be punishable under 18 U.S.C. 1001.

(8) The transferee understands that its rights and duties concerning registration under FIFRA and Part 40, Chapter 1 of the Code of Federal Regulations will be deemed by EPA to be the same as those of the transferor at the time the transfer is approved.


George Sabbagh
Authorized Representative of Transferor
Bayer CropScience LP

3-27-2019
Date


John Arthur
Authorized Representative of Transferee
BASF Corporation

3-26-2019
Date

Page 3 of 3
Notarized Statement
Required by 40 CFR 152.135(c)

The transferor, Bayer CropScience LP hereby affirms that:

- (1) The person signing the transfer agreement, George Sabbagh, is authorized by the registrant to bind the transferor.
- (2) No court order prohibits the transfer, and any required court approvals have been obtained.
- (3) The transfer is authorized under all federal, state and local laws and all relevant corporate charters, bylaws, partnerships, or other agreements.


Kristine Kring

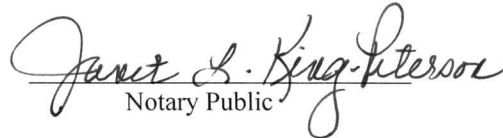
Associate General Counsel, Assistant Secretary
Authorized Representative of Bayer CropScience LP

1. NOTARIAL CERTIFICATE

UNITED STATES OF AMERICA)
STATE OF North Carolina)
COUNTY OF Durham)

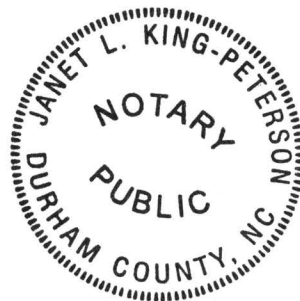
I, Janet L. King-Peterson, a Notary Public for said County and State, do hereby certify
that Kristine Kring personally appeared before me this day and acknowledged the
due execution of the foregoing instrument.

Witness my hand and official seal, this the 2nd day of April, 2019.


Notary Public

My commission expires:

Dec. 27, 2019



**Summary Information For
Product Registration - Section 3
264-789**

Registration #: 264-789
Registration Name: [PONCHO 600](#)
Company: [264 - BAYER CROPSCIENCE LP](#)
Current Status: [Active - Conditionally Registered \(19-Jun-2003\)](#)
Restricted Use: No

Active Ingredients

PC Code	CAS #	Ingredient Name	Percent Active
044309	210880-92-5	Clothianidin	48
Total Rows: 1			

Organization: RD / IVB3
Team: Registration Division, Risk Management Team 1
Eagle, Venus 703-308-8045
Child Resistant Package: Product Involve CRP? N/A
CRP Status? N/A
CRP Certificate Acceptable? N/A
CRP Certificate Decision Date: N/A
Withdraw Date (if voluntary): N/A
Signal Word: Caution
Physical Form: Emulsifiable Concentrate
Pesticide Category: INSECTICIDE
Label Image: [View Label Image](#)

Inert Ingredients

Close

Print

**Summary Information For
Product Registration - Section 3
264-1109**

Registration #: 264-1109
Registration Name: [PONCHO/VOTIVO](#)
Company: [264 - BAYER CROPSCIENCE LP](#)
Current Status: [Active - Conditionally Registered \(16-Mar-2010\)](#)
Restricted Use: No

Active Ingredients

PC Code	CAS #	Ingredient Name	Percent Active
029072		Bacillus firmus strain I-1582	8.1
044309	210880-92-5	Clothianidin	40.3
Total Rows: 2			

Organization: RD / IVB3
Team: Registration Division, Risk Management Team 1
Eagle, Venus 703-308-8045
Child Resistant Package: Product Involve CRP? N/A
CRP Status? N/A
CRP Certificate Acceptable? N/A
CRP Certificate Decision Date: N/A
Withdraw Date (if voluntary): N/A
Signal Word: Caution
Physical Form: Emulsifiable Concentrate
Pesticide Category: NEMATOCIDE
INSECTICIDE
Label Image: [View Label Image](#)

Inert Ingredients

Close

Print

<https://www.ups.com/cship/create?ActionOriginPair=default> PrintWindowP... 4/2/2019

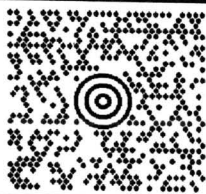
SUNDEE WILLIAMS
919-549-2255
BAYER CROPSCIENCE
2 TW ALEXANDER DR
RESEARCH TRIANGLE PARK NC 27709

0.0 LBS LTR

1 OF 1

SHIP TO:

LOUIS VAUGHN
(703)308-8114
EPA DOCUMENT PROCESSING DESK (XFER)
ROOM S-4900, ONE POTOMAC YARD
2777 SOUTH CRYSTAL DRIVE
ARLINGTON VA 22202-3553



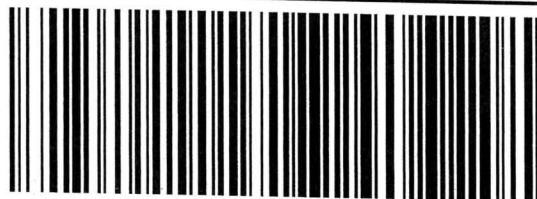
VA 222 9-11



UPS NEXT DAY AIR

TRACKING #: 1Z F36 9Y1 01 9556 9053

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BILLING: P/P

Reference # 1: CJ93716002

CS 21.0.21. WNTINV50 09.0A 01/2019



CJ93716002





June 27, 2019

U.S. Environmental Protection Agency
Document Processing Desk
Office of Pesticide Programs (7504P)
Room S4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Attention: Louis Vaughn

Subject: Registration Transfer of Poncho 600 (EPA Registration Number 264-789) and Poncho Votivo (EPA Registration number 264-1109)

Dear Mr. Vaughn:

BASF Corporation and Bayer CropScience LP together ask for EPA to temporarily suspend the clothianidin transfer request from Bayer CropScience LP (EPA Company Number 264) to BASF Corporation (EPA Company Number 7969) in the letter dated March 26, 2019 which was received by EPA April 03, 2019.

This original transfer request contained the product registration transfer of Poncho 600 (EPA Registration Number 264-789) and Poncho Votivo (EPA Registration number 264-1109) as well as the transfer of ownership of Bayer data associated with clothianidin. This delay request specifically applies to the two product registrations only, both parties understand that EPA will continue as scheduled with the associated data ownership transfer as previously requested. We further request that EPA resume processing of the transfer of the product registrations on September 9, 2019.

This delay request until September 9th should allow both below signed parties to address production concerns of the Poncho 600 supplemental registration Acceleron IC-609 (EPA Registration Number 264-789-524). The sub-registrant formerly Monsanto is now Bayer, therefore all impacted parties agree with this request.

Should there be any additional questions, please feel free to reach out to either party by phone or email. John Arthur -919-547-2607, john.arthur@basf.com or George Sabbagh 919-549-2589, george.sabbagh@bayer.com

Sincerely,

John J. Arthur,
Manager of Federal Registrations, BASF Corporation

George S. Sabbagh
Director of Federal Registrations, Bayer CropScience LP



We create chemistry

September 5, 2019

U.S. Environmental Protection Agency
Document Processing Desk (XFER)
Office of Pesticide Programs (7504P)
Room S4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Attention: Louis Vaughn

Subject: Registration Transfer of Poncho 600 (EPA Registration Number 264-789) and Poncho Votivo (EPA Registration number 264-1109)

Dear Mr. Vaughn:

BASF Corporation and Bayer CropScience LP together ask for EPA to continue to delay the clothianidin transfer request from Bayer CropScience LP (EPA Company Number 264) to BASF Corporation (EPA Company Number 7969) in the request received by EPA April 03, 2019. We had on June 29, 2019 requested an initial delay to September 9, 2019.

This transfer request contained the product registration transfer of Poncho 600 (EPA Registration Number 264-789) and Poncho Votivo (EPA Registration number 264-1109) as well as the transfer of ownership of Bayer data associated with clothianidin. This delay request specifically applies to the two product registrations only, as EPA has already transferred the data ownership as previously requested. We further ask that EPA resume processing of the transfer of the product registrations on October 30, 2019.

This delay request until October 30th should allow both below signed parties to address production concerns of the Poncho 600 supplemental registration Acceleron IC-609 (EPA Registration Number 264-789-524). The sub-registrant formerly Monsanto is now Bayer, therefore all impacted parties agree with this request.

Should there be any additional questions, please feel free to reach out to either party by phone or email. John Arthur -919-547-2607, john.arthur@basf.com or George Sabbagh 919-549-2589, george.sabbagh@bayer.com

Sincerely,

A handwritten signature in blue ink, appearing to read "John J. Arthur".

John J. Arthur,
Manager of Federal Registrations, BASF Corporation

A handwritten signature in black ink, appearing to read "G.S. Sabbagh".

George S. Sabbagh
Director of Federal Registrations, Bayer CropScience LP

BASF Corporation
26 Davis Drive
PO Box 13528
Research Triangle Park, NC 27709-3528

Vaughn, Louis

From: Amy J McCaskill <amy.mccaskill@basf.com>
Sent: Tuesday, October 29, 2019 3:43 PM
To: Vaughn, Louis; John J Arthur; George.Sabbagh@Bayer.com
Subject: RE: 264 to 7969 Questions

Louis, thanks for following up. Jack and I have discussed and BASF is ready to proceed with the transfer.

Best Regards,
Amy McCaskill
Product Registrations Manager

Phone: +1 919 547-7394, Mobile: +1-919-600-4794, Email: amy.mccaskill@basf.com
Postal Address: BASF Corporation, 26 Davis Drive, 27709-3528 Research Triangle Park, United States



From: Vaughn, Louis <Vaughn.Louis@epa.gov>
Sent: Tuesday, October 29, 2019 2:48 PM
To: John J Arthur <john.arthur@basf.com>; George.Sabbagh@Bayer.com
Cc: Amy J McCaskill <amy.mccaskill@basf.com>
Subject: FW: 264 to 7969 Questions

On April 03, 2019, the Agency received a Product Registration Only Transfer from **BAYER CropScience LP (264)** to **BASF Corporation (7969)**. This involved product **264-789** and product **264-1109**. Due to production issues, there have been two requests for delay in processing this transfer. The last request was on September 05, 2019. That request was to delay the transfer until **October 30, 2019**.

QUESTION: Do both parties still wish for us to process this transfer on 10/30/2019?

Best regards.

Louis Vaughn, MS
Information Management Specialist
USEPA/OCSP/OPP/ITRMD/ISB

From: Amy J McCaskill <amy.mccaskill@basf.com>
Sent: Thursday, September 05, 2019 2:36 PM
To: Vaughn, Louis <Vaughn.Louis@epa.gov>; George.Sabbagh@Bayer.com; John J Arthur <john.arthur@basf.com>
Subject: RE: 264 to 7969 Questions

Hi Louis,

Please find attached our letter requesting a delay in the transfer of the clothianidin registration. Let me know if you have any additional questions and thanks again for your flexibility.

Best Regards,

Vaughn, Louis

From: George Sabbagh <george.sabbagh@bayer.com>
Sent: Tuesday, October 29, 2019 8:45 PM
To: Vaughn, Louis; John.Arthur@BASF.com
Cc: Amy J McCaskill; Lisa Bowers; BCSReg_Archive
Subject: RE: 264 to 7969 Questions

Hi Louis, Bayer would like to see this transfer moving forward. Thank you.

Freundliche Grüße / Best regards,

George Sabbagh, Ph.D.
Director Registrations



Science For A Better Life

Crop Science, a Division of Bayer
801 Pennsylvania Avenue, NW
Suite 745
Washington, DC 20004
Cel: +1 913 231 6291
E-mail: george.sabbagh@bayer.com
Web: <http://www.bayercropscience.com>

From: Vaughn, Louis <Vaughn.Louis@epa.gov>
Sent: Tuesday, October 29, 2019 2:48 PM
To: John.Arthur@BASF.com; George Sabbagh <george.sabbagh@bayer.com>
Cc: Amy J McCaskill <amy.mccaskill@basf.com>
Subject: FW: 264 to 7969 Questions

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QUESTION: Do both parties still wish for us to process this transfer on 10/30/2019?

Best regards.

Louis Vaughn, MS
Information Management Specialist
USEPA/OCSP/OPP/ITRMD/ISB

From: Amy J McCaskill <amy.mccaskill@basf.com>
Sent: Thursday, September 05, 2019 2:36 PM

To: Vaughn, Louis <Vaughn.Louis@epa.gov>; George.Sabbagh@Bayer.com; John J Arthur <john.arthur@basf.com>

Subject: RE: 264 to 7969 Questions

Hi Louis,

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Best Regards,
Amy McCaskill
Product Registrations Manager

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Postal Address: BASF Corporation, 26 Davis Drive, 27709-3528 Research Triangle Park, United States



From: Vaughn, Louis <Vaughn.Louis@epa.gov>

Sent: Thursday, September 5, 2019 9:38 AM

To: Amy J McCaskill <amy.mccaskill@basf.com>; George.Sabbagh@Bayer.com

Subject: FW: 264 to 7969 Questions

Ms. McCaskill,

Per our conversation yesterday (09/04/2019) you have requested that we again reschedule the Product Transfer, received on 04/03/2019, from **Bayer CropScience LP (264)** to **BASF Corporation Agricultural Products (7969)**. Due to production and existing stocks issues, you had requested that we reschedule processing until 09/09/2019. This second rescheduling is to 10/30/2019.

Please submit a letter to me (signed and dated by both Bayer and BASF) requesting this second rescheduling to Wednesday, October 30, 2019.

You may address it to me at the courier address:

Document Processing Desk (**XFER**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Dr.
Arlington, VA 22202

Or, you may fax it to (703) 305-7670

Best regards.

Louis Vaughn - USEPA

From: Vaughn, Louis

Sent: Wednesday, September 04, 2019 9:48 AM

To: Amy J McCaskill <amy.mccaskill@basf.com>

Subject: RE: 264 to 7969 Questions

Ms. McCaskill,

Just for reference, I note that this is regarding the two transfer agreements, received on 04/03/2019, from **Bayer CropScience LP (264) to BASF Corporation Agricultural Products (7969)**. As you know, we have already completed the data transfer. The product registration transfer was for two products ("**Poncho 600**" **264-789** and "**Poncho/Votivo**" **264-1109**).

On June 25, 2019 you inquired about delaying the product transfer, due to production/supply/existing stocks issues involving the distributor product that is based upon product **264-789**. You wished to delay the transfer until you could fulfill orders regarding Distributor Product **264-789-524** which also goes by the name **Acceleron IC 609**. On June 27, 2019, the Agency received a formal letter, signed by both transferor and transferee, requesting that we "hold" processing of the product registration transfer until 09/09/2019. The letter requested that we "resume processing" of the transfer on 09/09/2019. We agreed to this.

Barring any externalities (including Hurricane Dorian) we anticipate that this transfer will be completed next week.

Do you wish to delay the processing again? Or, to complete it quickly?

Louis Vaughn – USEPA/OCSP/OPP/ITRMD/ISB

From: Amy J McCaskill <amy.mccaskill@basf.com>

Sent: Wednesday, September 04, 2019 7:51 AM

To: Vaughn, Louis <Vaughn.Louis@epa.gov>

Subject: 264 to 7969 Questions

Hi Louis,

I hope all is well. I just reached out by phone but instead of a voicemail I thought I would send you an email to ask a couple of questions. We previously agreed the delay of registration transfers would be held from processing until September 9th. As that is quickly approaching I wanted to ask for some clarification about the next steps. Will the transfer request go to the back of the line on September 9th or will you immediately begin to process those? If you have a rough estimate of when they would come through that would be very helpful. There are still some product supply issues between the two companies that are not solved and we are trying to decide if we will need to withdraw the transfer request. I hope to hear from you soon and thanks so much for all your flexibility and help in dealing with these challenges, it is much appreciated.

Best Regards,
Amy McCaskill
Product Registrations Manager

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